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ATTORNEY FOR DEFENDANT
Joshua L. Klipp

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	2:14-cr-00107-TLN-1
)	
PLAINTIFF,)	
)	STIPULATION AND ORDER
v.)	TO CONTINUE STATUS
)	CONFERENCE AND EXCLUDE
JOSHUA L. KLIPP,)	TIME
)	
)	
DEFENDANT.)	
_____)	
_____)	

Joshua L. Klipp, by and through his counsel, Michael J. Aye, and the United States Government, by and through its counsel, Andre M. Espinosa, Assistant United States Attorney, hereby stipulate and agree to vacate the previously scheduled Status Conference Date of December 4, 2014 and re-set the status conference date to January 29, 2015 at 9:30 a.m.

The parties need additional time to explore settlement options. Mr. Espinosa has only recently been assigned to this case and counsel have not had adequate time to discuss this matter. Counsel for Defendant is also still reviewing the

1 discovery in this matter. Without the additional time, defense
2 counsel cannot adequately advise his client concerning the
3 options available to the Defendant in this matter.

4
5 It is further stipulated and agreed between the parties
6 that the period beginning December 4, 2014 to January 29, 2015,
7 should be excluded in computing the time within which the trial
8 of the above criminal prosecution must commence for purposes of
9 the Speedy Trial Act for defense preparation.

10
11 All parties stipulate and agree that this is an appropriate
12 exclusion of time within the meaning of Title 18, United States
13 Code, Section 3161 (h) (8) (iv) (Local Code T4).

14
15
16 Dated: 11/24/2014

17
18 /S/ Michael J. Aye
19 Michael J. Aye, Attorney for
20 Defendant, Joshua L. Klipp


21 Date: 11/24/2014

22 /S/ Andre M. Espnosa
23 Andre M. Espinosa, AUSA, Attorney for
24 Plaintiff, United States of America

ORDER

The parties' stipulation is approved and so ordered. The time beginning December 4, 2014, until January 29, 2015, is excluded from the calculation of time under the Speedy Trial Act. For the reasons contained in the parties' stipulation, this exclusion is appropriate to ensure effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv); Local Code T4. The interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A)

Dated: November 25, 2014


Troy L. Nunley
United States District Judge